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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ELIZABETH ACUNA,

Defendant.

CASE NO. 2:22-CR-00012-TLN

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: May 5, 2022
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on May 5, 2022.
2. By this stipulation, defendant now moves to continue the status conference until July 14, 2022, at 9:30 a.m., and to exclude time between May 5, 2022, and July 14, 2022, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes approximately 150 pages documents, including investigative reports, photographs, and drug analysis reports, as well as audio and video recordings. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
 - b) Counsel for the government has indicated that additional discovery, including

1 search warrants, memorandums, and reports are forthcoming.

2 c) Counsel for defendant desires additional time to review the additional discovery
3 with her client, and to conduct investigation and research into mitigation factors.

4 d) Counsel for defendant believes that failure to grant the above-requested
5 continuance would deny her the reasonable time necessary for effective preparation, taking into
6 account the exercise of due diligence.

7 e) The government does not object to the continuance.

8 f) Based on the above-stated findings, the ends of justice served by continuing the
9 case as requested outweigh the interest of the public and the defendant in a trial within the
10 original date prescribed by the Speedy Trial Act.

11 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
12 et seq., within which trial must commence, the time period of May 5, 2022 to July 14, 2022,
13 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
14 because it results from a continuance granted by the Court at defendant's request on the basis of
15 the Court's finding that the ends of justice served by taking such action outweigh the best interest
16 of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: May 2, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ ALSTYN BENNETT
ALSTYN BENNETT
Assistant United States Attorney

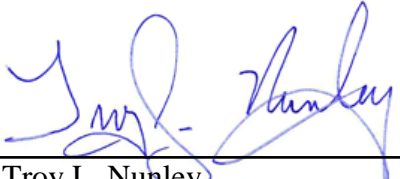
HEATHER D. WILLIAMS
Federal Defender

Dated: May 2, 2022

/s/ MEGAN T. HOPKINS
MEGAN T. HOPKINS
Counsel for Defendant
ELIZABETH ACUNA

ORDER

IT IS SO FOUND AND ORDERED this 2nd day of May, 2022.



Troy L. Nunley
United States District Judge